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*United HealthCare Insurance Company and*  
*United HealthCare Services*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

FREMONT EMERGENCY SERVICES  
(SCHERR), LTD.;

Plaintiff,

vs.

UNITEDHEALTHCARE INSURANCE  
COMPANY and UNITED  
HEALTHCARE SERVICES, INC.,

Defendants.

CASE NO.: 2:22-cv-01118-CDS-BNW

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND DEADLINE  
FOR DEFENDANTS' REPLY IN  
SUPPORT OF THEIR MOTION TO  
STAY DISCOVERY**

**(FIRST REQUEST)**

1 Defendants UnitedHealthcare Insurance Company and United Healthcare  
2 Services, Inc. and Plaintiff Fremont Emergency Services (Scherr), Ltd. (collectively, the  
3 “Parties”), by and through their attorneys of record, hereby stipulate and agree to the  
4 following:

5 1. Defendants filed a Motion to Dismiss Plaintiff’s Complaint on September 8,  
6 2022. (ECF No. 29).

7 2. The Parties stipulated and the Court extended Plaintiff’s response to the  
8 Motion to Dismiss to October 17, 2022. (ECF No. 36).

9 3. Defendants filed a Motion to Stay Discovery on September 29, 2022.  
10 (ECF No. 40).

11 4. The Parties stipulated and the Court extended Plaintiff’s response to the  
12 Motion to Stay Discovery to October 21, 2022, with Defendants’ Reply to be due thereafter  
13 on November 4, 2022. (ECF No. 44).

14 5. The Parties stipulated and the Court extended Plaintiff’s response to the  
15 Motion to Dismiss to October 21, 2022, with Defendants’ Reply to be due on November 9,  
16 2022. (ECF No. 46).

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6. Given the overlap between the pending Motion to Dismiss and Motion to Stay Discovery, the Parties hereby request that **Defendants' Reply to the Motion to Stay Discovery also be due on November 9, 2022.**

DATED this 3rd day of November, 2022

DATED this 3rd day of November, 2022

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IT IS SO ORDERED:



UNITED STATES DISTRICT COURT JUDGE

DATED: November 4, 2022

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